

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MENIFEE COUNTY BOARD OF EDUCATION)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2011-00076
CLARK ENERGY COOPERATIVE, INC.)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CLARK ENERGY COOPERATIVE, INC.

Pursuant to 807 KAR 5:001, Commission Staff requests Clark Energy Cooperative, Inc. ("Clark Energy") to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due no later than 14 days from the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and

accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Clark Energy shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Clark Energy fails or refuses to furnish all or part of the requested information, Clark Energy shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Refer to Clark Exhibit No. 2 from the July 18, 2011 Informal Conference. Provide the manufacturer, date of manufacture, and kVa capacity rating from the name plate on each of the three overhead transformers at meter point two.

2. Does Clark Energy install meter points, such as meter points two and three at the Menifee County High School, so closely together without consulting with the customer? Explain.

3. Does Clark Energy produce a monthly, quarterly, or annual report that shows significant changes in kWh usage or kW demand, as to billing records, from one time period to another for commercial and industrial customers?

a. If so, how is this information used in load forecasting? Explain.

b. Are customers contacted as to the reason for any change or shift in kWh usage or kW demand? Explain.

4. When transformer banks are placed on poles or pad-mount transformers are installed, does Clark Energy use its own crews or contractor crews?

5. Is a public board of education subject to a school tax on its monthly bills? If yes, is the public board of education charged an administrative fee for the collection of the school tax?

6. Refer to the Answer of Clark Energy Cooperative, Inc., filed May 12, 2011 ("Answer"). In paragraph 3, Clark Energy states that it "could not be aware of when the load was transferred or what the remaining load would be." Explain fully why Clark Energy would not know when the load was transferred to the pad-mount transformer.

7. Refer to Clark Energy's Answer, paragraph 2, in which Clark Energy states that service to the Menifee County Board of Education ("Menifee County") was established November 20, 1951.

a. At the informal conference held on July 18, 2011, Clark Energy stated that there was no documentation to support the minimum contract demand charge of 135 kW. Absent any documentation to support this contract demand, how does Clark Energy know that 135 kW is correct? Provide any other evidence that this is the correct amount.

b. How long has Clark Energy billed Menifee County for this contract demand?

c. How long has Clark Energy billed Menifee County on rate schedule L?

- d. How many accounts does Menifee County have with Clark Energy?

Provide a list of accounts including service address, meter number, description of the facility, and the rate schedule billed.

- e. List the Clark Energy minimum demand rate levels.

- 8. Refer to paragraph 5 of Clark Energy's Answer.

- a. Describe the reviews performed by third-party contractors.

- b. Identify all of the contractors involved in the reviews.

c. Provide any reports issued by the contractors on the results of the reviews.

d. Provide copies of the information provided by Clark Energy to the contractors.

9. Explain why Clark Energy transferred the account in question from rate schedule L to rate schedule C. When did the transfer to schedule C occur?

10. Refer to Menifee County's Complaint filed April 20, 2011, wherein Menifee County states that the overhead transformer system serving the high school account has an average metered demand of 37 kW.

a. Does Clark Energy dispute that the overhead transformer system serving the high school has an average metered demand of 37 kW?

b. If the overhead transformer system serving the high school account has an average metered demand of 37 kW, how was a minimum contract demand of 135 kW determined to be the correct minimum demand to be billed?

11. Refer to Clark Exhibit No. 2 from the July 18, 2011 Informal Conference. Provide copies of the bills for metering point two and for metering point three for the time period January 1, 2003 through the most recent billing.

12. Refer to Menifee Exhibit No. 1 from the July 18, 2011 Informal Conference, Clark Energy's bill to Menifee County dated 05/08/2000, and Menifee Exhibit No. 2, Clark Energy's bill to Menifee County dated 06/06/2000.

a. On Exhibit No. 1, refer to line labeled "Demand." Explain what the number "0.990" is and how it impacts the calculation of Menifee County's bill.

b. On Exhibit No. 2 refer to line labeled "Demand." Explain what the number "1.272" is and how it impacts the calculation of Menifee County's bill.

c. Is this line included on Menifee County's current billing?

13. Provide copies of the work orders, or other job requisitioning paperwork, and dates required to establish the Menifee County Board of Education pad-mount installation service.

14. Refer to Clark Exhibit No. 2 from the July 18, 2011 Informal Conference. Provide copies of the work orders, or other job requisitioning paperwork, and dates required to replace the three overhead Menifee County transformers serving metering point two.

15. Is there a minimum demand charge set for each metering point for the Menifee County meters? If yes, provide details.

16. Does Clark Energy have written procedures governing the accounting for line transformers? If so, provide a copy of the procedure.

a. Provide the detail information maintained for purchased line transformers that are capitalized in Account 368 – Line Transformers.

b. Describe the types of records maintained for property tax purposes when a capitalized line transformer is transferred from one taxing district, such as from a service center, to a location in another taxing district for in-service use.


Jeff Derouen
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DATED **AUG 17 2011**

cc: Parties of record

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